

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

In re CASSAVA SCIENCES, INC.  
SECURITIES LITIGATION

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Master File No. 1:21-cv-00751-DAE

CLASS ACTION

This Document Relates To:

ALL ACTIONS

**JOINT MOTION TO AMEND SCHEDULING RECOMMENDATIONS**

Lead Plaintiff Mohammad Bozorgi and additional plaintiffs Ken Calderone and Manohar Rao (collectively, “Plaintiffs”) and defendants Cassava Sciences, Inc., Remi Barbier, Lindsay Burns, Eric Schoen (collectively, “Defendants”) respectfully move the Court to extend certain deadlines, including deadlines set out in the parties’ jointly submitted scheduling recommendations, and would show the Court as follows:

1. On August 18, 2022, Plaintiffs filed a Consolidated Amended Complaint (“Amended Complaint”) alleging violations of the federal securities laws by Defendants and Nadav Friedmann.

2. Defendants moved to dismiss the Amended Complaint on October 25, 2022 (the “Motion to Dismiss”), and following briefing and oral argument, the Court ordered on May 10, 2023, that Plaintiffs’ claims against defendant Nadav Friedmann were dismissed and that the Motion to Dismiss was denied as to the claims against all other Defendants.

3. On May 9, 2023, the parties jointly submitted scheduling recommendations that, among other things, set out proposed dates for the substantial completion of document production, the completion of fact discovery, expert reports and discovery, and class certification briefing (the

“Scheduling Recommendations,” *see* attached as Exhibit 1). The Court has not yet ruled on the Scheduling Recommendations.

4. Defendants answered the Amended Complaint on July 3, 2023.

5. On July 21, 2023, the parties submitted an Agreed Motion Regarding Extension of Time to File a Rule 12(f) Motion Regarding Defendants’ Answer. On July 24, 2023, the Court granted that motion, extending the deadline for Plaintiffs to file a Rule 12(f) Motion until August 31, 2023. *See* ECF No. 109.

6. The parties are currently in discussions regarding the potential resolution of the claims set forth in the Amended Complaint and, to that end, have scheduled a mediation before a private mediator for November 7, 2023.

7. In light of the scheduled mediation, and in the interests of economy and efficiency, the parties wish to extend several of the deadlines contained in the Scheduling Recommendations as follows:

<b>Event</b>	<b>Initial Recommendation</b>	<b>New Recommendation</b>
Substantial completion of document production (¶ 4)	December 15, 2023	April 15, 2024
Completion of fact discovery (¶ 5)	May 17, 2024	September 17, 2024
Opening expert reports (¶ 6)	July 1, 2024	November 1, 2024
Rebuttal expert reports (¶ 6)	August 15, 2024	December 15, 2024
Motion for class certification (¶ 9)	November 13, 2023	March 13, 2024
Opposition to motion for class certification (¶ 9)	December 28, 2023	April 28, 2024
Reply in support of motion for class certification (¶ 9)	February 12, 2024	June 12, 2024

8. In addition, the parties wish to extend the deadline for the plaintiffs to file a Rule 12(f) motion from August 31, 2023 to January 5, 2024.

9. These proposed modifications to the case schedule will not affect any other deadlines.

DATED: August 3, 2023

Respectfully submitted,

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*/s/ Kevin A. Lavelle*

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### **CERTIFICATE OF CONFERENCE**

The undersigned certifies that the parties' counsel conferred by email.

/s/ William J. Foley  
William J. Foley

### **CERTIFICATE OF SERVICE**

The undersigned certifies that on August 3, 2023, a true and correct copy of this motion was served upon each attorney of record through the Court's CM/ECF system.

/s/ Pam Howell  
Pam Howell